

Sheri M. Thome, Esq.
Nevada Bar No. 008657
WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
Telephone: (702) 727-1400
Facsimile: (702) 727-1401
Sheri.Thome@wilsonelser.com

AARON FORD
Attorney General
Steve Shevorski
Chief Litigation Counsel
Nevada Bar No. 008256
Kiel B. Ireland
Deputy Attorney General
Nevada Bar No. 15368C
State of Nevada
Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, NV 89101
Telephone: (702) 486-3420
Facsimile: (702) 486-3773
sshevorski@ag.nv.gov
kireland@ag.nv.gov

*Attorneys for Defendant The State of Nevada, ex rel.
its Department of Corrections*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONALD WALDEN, JR., et al., etc.,

Plaintiffs,

v.

THE STATE OF NEVADA, EX REL. NEVADA
DEPARTMENT OF CORRECTIONS, and
DOES 1-50,

Defendants.

CASE NO: 3:14-cv-00320-MMD-WGC

**STIPULATION AND ORDER TO
REQUEST THAT THE COURT EXTEND
DEADLINE FOR FILING RENEWED
MOTION TO SEAL
(FIRST REQUEST)**

Defendant the State of Nevada, *ex rel.* its Nevada Department of Corrections (“NDOC”) and
Plaintiffs Donald Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt, Timothy
Ridenour, and Daniel Tracy, on behalf of themselves and all others similarly situated (“Plaintiffs”),
by and through their respective counsel of record, hereby agree and request that the Court extend the

Donald Walden, Jr., et al. v. The State of Nevada, et al.
Case No. 3:14-cv-00320-MMD-WGC

1 deadline set in ECR No. 392 regarding NDOC's renewed Motion to Seal¹, which is currently set for
2 April 18, 2022, by four (4) days, to April 22, 2022. This would also extend the date for Plaintiffs'
3 Reply, currently set for April 28, 2022, to May 2, 2022.

4 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the
5 requested extension as the parties have been in communication about the exhibits to be filed under
6 seal. Counsel for NDOC has been conferring with Plaintiffs' counsel as to exhibits each believes
7 should or should not be sealed, and Counsel for NDOC has been conferring with its clients as to
8 limitations in the number of exhibits that need to be the subject of the motion. With the upcoming
9 holidays, Easter and Passover, additional time is needed in order to effectively analyze and confirm
10 each document and the exhibits to be successfully refiled before the Court. Accordingly, the parties
11 agree that the requested extension furthers the interest of this litigation and is not being requested in
12 bad faith or to delay these proceedings unnecessarily.

13 This is the parties' first request for extension of these deadlines.

14 DATED this 14th day of April, 2022.

15 WILSON ELSER MOSKOWITZ
16 EDELMAN & DICKER LLP

17 /s/ Sheri M. Thome
18 Sheri M. Thome, Esq.
19 Nevada Bar No. 008657
20 6689 Las Vegas Blvd. South, Suite 200
21 Las Vegas, NV 89119
22 *Attorneys for Defendants The State of Nevada,*
23 *ex rel. its Department of Corrections*

24 DATED this 14th day of April, 2022.

25 THIERMAN BUCK LLP

26 /s/ Joshua D. Buck
27 Mark R. Thierman, Esq.
28 Nevada Bar No. 8285
Joshua D. Buck, Esq.
Nevada Bar No. 12187
Reno, Nevada 89511
Attorneys for Plaintiffs

¹ NDOC does not need an extension to be able to file the revised Motion to Exclude All Evidence from Plaintiffs' Experts [ECF 351].

Donald Walden, Jr., et al. v. The State of Nevada, et al.
Case No. 3:14-cv-00320-MMD-WGC

ORDER

GOOD CAUSE SHOWN, the extension requested is granted. Defendant has until April 22, 2022 to file a renewed Motion to Seal, as directed in this Court's Order dated April 7, 2022. Plaintiffs have until May 2, 2022 to respond to Defendant's Motion.

Dated this 18th day of April, 2022.



UNITED STATES DISTRICT JUDGE